

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

UNITED STATES OF AMERICA	§	
	§	
vs.	§	CRIMINAL NO. 4:14-CR-074-Y
	§	
JONATHAN DANIEL KUTEJ (1)	§	

MOTION TO CONTINUE TRIAL

TO THE HONORABLE JUDGE TERRY R. MEANS:

NOW COMES JONATHAN DANIEL KUTEJ (1), Defendant in the above styled cause of action and hereby files this his Motion to Continue Trial by and through his attorney of record, J. Warren St. John, and will show the court the following:

1. Defendant would show that the case is presently set for trial on Monday, September 22, 2014 at 10:30 a.m..
2. Defendant's attorney of record would show that he is the third attorney to represent the Defendant. Defendant's attorney was appointed on June 11, 2014.
3. Defendant's attorney of record would also show that Defendant just recently provided the undersigned attorney with additional information, which needs to be investigated in order to adequately prepare for trial.
4. Defendant needs additional time to provide his Witness List to the Court.
5. Defendant is requesting a forty-five (45) day continuance. Defendant's attorney has no conflicting dates.
6. Defendant would show that said Motion for Continuance is not sought for delay, but so that justice may be done.

WHEREFORE, PREMISES CONSIDERED, Defendant prays that said Motion be

granted in all things, that said case be reset on the Court's docket and that he be excused from having to appear as currently scheduled.

Respectfully submitted,

s/J. Warren St. John
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ATTORNEY FOR DEFENDANT (1)

CERTIFICATE OF CONFERENCE

I hereby certify that on September 8, 2014, my office corresponded with Ms. Aisha Saleem in order to determine whether she would or would not oppose the foregoing Motion to Continue Trial. Ms. Saleem is opposed.

s/J. Warren St. John
J. WARREN ST. JOHN

Attorney for Defendant (1)

CERTIFICATE OF SERVICE

I hereby certify that on September 8, 2014, I electronically filed the foregoing document with the clerk for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. The electronic case filing system sent a "Notice of Electronic Filing" to the following attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means: Ms. Aisha Saleem.

s/J. Warren St. John
J. WARREN ST. JOHN

Attorney for Defendant (1)